



Mr. James Saric
Remedial Project Manager
USEPA Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies Monthly Progress Report
Area 1 – Morrow Dam to Plainwell Dam (November 2007)

Dear Jim:

Attached is the ninth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental RI/FS – Area 1. This progress report is submitted as per Section 7.1 of the Statement of Work (SOW) for the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864). If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS of New York, Inc.

Michael J. Erickson, P.E.
Associate Vice President

Attachment

Copies:

Michael Berkoff, USEPA
Sam Chummar, USEPA
Michael Ribordy, USEPA
Paul Bucholtz, MDEQ
Jeff Keiser, CH2M Hill
Bonnie Barnett, Esq., Drinker Biddle & Reath LLP
Steven Cook, Esq., Millennium Holdings, LLC
J. Michael Davis, Esq., Georgia-Pacific Corporation
Mellonie Fleming, Esq., Georgia-Pacific Corporation
Mark Tapp, Millennium Holdings, LLC
Paul Montney, P.E., Georgia-Pacific Corporation
L. Chase Fortenberry, P.G., Georgia-Pacific Corporation
Mark Brown, Ph.D., Georgia-Pacific Corporation

ARCADIS U.S., Inc.
10559 Citation Dr., Suite 100
Brighton
Michigan 48116
Tel 810.229.8594
Fax 810.229.8837
www.arcadis-us.com

INDUSTRIAL

Date:

December 17, 2007

Contact:

Michael J. Erickson, P.E.

Phone:

810.225.1924

Email:

michael.erickson@
arcadis-us.com

Our ref:

B0064524.014 #2

Imagine the result



**MONTHLY PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE SRI/FS
AREA 1 (MORROW DAM TO PLAINWELL DAM)**

REPORT #9, NOVEMBER 2007

**PREPARED BY ARCADIS BBL
DECEMBER 17, 2007**

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)

SUBMITTED TO

**JAMES SARIC, REMEDIAL PROJECT MANAGER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Area 1**

REPORT #9, NOVEMBER 2007

Significant Developments and Activities during the Period, Including Actions Undertaken Pursuant to the AOC and SOW

- On November 6, the USEPA e-mailed ARCADIS BBL the peer review candidate rankings.
- On November 8, the USEPA transmitted to ARCADIS BBL comments on the draft peer review charge regarding KRSG-funded studies related to ecological risk in the floodplain.
- On November 14, the USEPA transmitted to ARCADIS BBL additional comments on the draft peer review charge regarding KRSG-funded studies related to ecological risk in the floodplain.
- ARCADIS BBL continues to obtain access agreements to permit the collection of SRI samples. Table A presents a list of the two landowners from whom ARCADIS BBL has not received a signed access agreement as of November 30.
- The KRSG awaits acceptance of the *Data Management Plan* (see Section 1.3 of the SOW), which was submitted to USEPA on June 8, 2007.
- The KRSG awaits USEPA's comments on the draft Conceptual Site Model, which was submitted to the USEPA on June 21, 2007. This report is discussed in Section 1.2.1.4 of the SOW.
- The KRSG awaits USEPA's response to the letter requesting USEPA's data usability determination for existing data for purposes of the SRI/FS, which was submitted to USEPA on August 27, 2007.
- The KRSG awaits USEPA's comments on the draft risk assessment framework (RAF), which was submitted to the USEPA on October 5, 2007. This framework is discussed in Section 1.2.1.5 of the SOW. On November 5, ARCADIS BBL forwarded three additional copies of the draft RAF to the USEPA at its request.

Data Collected and Field Activities Conducted During the Period

- In November, ARCADIS BBL continued to collect water column samples every other day at the upstream and downstream locations related to the Former Plainwell Impoundment Time-Critical Removal Action (TCRA). Table B summarizes the samples collected that were sent to TestAmerica Laboratories, Inc. (TestAmerica) for analysis. This sampling is discussed in Section 3.4.5 of the SRI/FS Work Plan.
- On November 6 and 7, ARCADIS BBL collected yearling smallmouth bass in the Otsego City Impoundment to assess effects of the Former Plainwell Impoundment TCRA. This sampling is

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Area 1**

REPORT #9, NOVEMBER 2007

discussed in Section 3.4.5 of the SRI/FS Work Plan. Table C presents a summary of the samples collected and sent to TestAmerica for analysis.

- During the week of November 12 and on November 27, ARCADIS BBL personnel reconnoitered and surveyed the area of historical inundation near Plainwell No. 2 Dam. This Phase I work is discussed in Section 3.4.2.1 of the SRI/FS Work Plan.
- On November 14, ARCADIS BBL personnel reconnoitered the sediment in the side channel at the Crown Vantage Landfill Area. This Phase I work is discussed in Section 3.4.3 of the SRI/FS Work Plan.
- On November 27, ARCADIS BBL personnel conducted a preliminary reconnoiter of the floodplain adjacent to the Crown Vantage Landfill Area. This Phase I work is discussed in Section 3.4.3 of the SRI/FS Work Plan.
- On November 27, ARCADIS BBL personnel collected a top-of-bank sample (KRT14) along the mill race and Kalamazoo River channel between the Plainwell No. 2 Dam and the confluence of the mill race and the river. Table F summarizes the sample collected. This work is discussed in Section 3.4.2.2 of the SRI/FS Work Plan. This sediment core is in a freezer in the Kalamazoo field office. Other top-of-bank samples were collected in October.
- On November 28, ARCADIS BBL personnel delineated the materials associated with four of the focused samples collected in 2000 (FF-32, FF-37, FF-40 and FF-42) between the Crown Vantage Landfill and the Plainwell No. 2 Dam. No signed access agreement has been received from the property owner of FF-35 (see Table A). This work is discussed in Section 3.4.4 of the SRI/FS Work Plan.
- ARCADIS BBL is pursuing resolution of the MDEQ's issue regarding segmentation of the soil and sediment core samples collected along the mill race and the Kalamazoo River between the Plainwell No. 2 Dam and the confluence of the mill race and river.

Laboratory Data Received During the Period

- On November 2, ARCADIS BBL received laboratory data for the surface water samples collected between October 14 and 26 (sample delivery group [SDG] TCRA11 and TCRA12). Table B presents a list of the samples for which data were received. The January 2008 monthly report will present the validated surface water data for these samples.
- On November 7 and 13, ARCADIS BBL received laboratory data for the 0- to 2-inch interval of the sediment cores taken from KPT transects KPT-19 through KPT-29 (SDG SRI001 was received on

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Area 1**

REPORT #9, NOVEMBER 2007

November 7; SDG SRI002 was received on November 13). Transects KPT-19 through KPT-29 are located in the reach between the former Georgia-Pacific Mill Lagoons and the Crown Vantage Landfill. These transects were first established and sampled in 1993/1994, resampled in 2000, and then resampled again in October 2007. Table E presents a list of the samples for which data were received. The January 2008 monthly report will present the validated data for these samples.

- On November 19, ARCADIS BBL received laboratory data for the 0- to 2-inch interval of the sediment cores taken from KPT transects KPT-48 to KPT-56 (SDG SRI003 and SRI004). Transects KPT-48 to KPT-56 are located in the reach from the Plainwell No. 2 Dam to the Mill Race Confluence. These transects were first established and sampled in 1993/1994, resampled in 2000, and then resampled again in October 2007. Table E presents a list of the samples for which data were received. The January 2008 monthly report will present the validated data for these samples.
- On November 26, ARACADIS BBL received laboratory data for the surface water samples collected between October 28 and November 7 (SDG TCRA13 and TCRA14). Table B presents a list of the samples for which data were received. The January and February 2008 monthly report will present the validated surface water data for samples collected in October and November, respectively.
- On November 30, ARCADIS BBL received laboratory data for the yearling fish collected in the Otsego City Impoundment on November 6 and 7 (SDG KAL437). The February 2008 monthly report will present the validated data for these samples.
- ARCADIS BBL awaits the results for the surface water samples collected from November 9 through 29.

Problems

- Availability of yearling smallmouth bass in Otsego City Impoundment was very low, and insufficient to produce the sample numbers called for in the SRI Work Plan.

Actions Taken to Correct Problems

- All collected fish were equally distributed into five composite samples of two fish apiece.

Developments Anticipated During the Next Two Reporting Periods

- In December, the KRSG will continue to work on the Baseline Ecological Risk Assessment (BERA) Report Peer Review Process (see Section 1.2.1.3 of the SOW).

**Monthly Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS – Area 1**

REPORT #9, NOVEMBER 2007

- In December (pending access from the landowner), ARCADIS BBL personnel are scheduled to collect the remaining bank soil sample (KRT13) between the Plainwell No. 2 Dam and the Mill Race Confluence. This work is discussed in Section 3.4.2.2 of the SRI/FS Work Plan.
- In December, ARCADIS BBL is scheduled to continue collecting water column samples every other day while excavation activities associated with the Former Plainwell Impoundment are underway. Samples will be collected at two locations associated with the Former Plainwell Impoundment TCRA. This sampling is discussed in Section 3.4.5 of the SRI/FS Work Plan.
- During the week of December 17, ARCADIS BBL is scheduled to perform bathymetric monitoring following completion of the 2007 construction season activities associated with the Former Plainwell Impoundment TCRA. This monitoring is discussed in Section 3.4.5 of the SRI/FS Work Plan.
- In December, ARCADIS BBL plans to provide results of the historical inundation area reconnaissance in the Plainwell Dam No. 2 area and a proposed soil sampling plan for review by USEPA and MDEQ.

**Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #9, November 2007**

Table A — Pending Property Access Agreements (as of November 30, 2007)

Sample ID	Tax Map Entity	Parcel ID(s)	Owner Name /Taxpayer Name	Notes
FF-35	Cooper Township	02-15-251-010	William S. Walker L/L Eugene A. Lehman	Initial letter was picked up on September 12, 2007. Second letter delivered to house on October 16. Spoke with Mr. Walker on November 5 and he granted verbal approval. Left message on November 26. Stopped at the Walker House on November 28 and 29, no one was home.
ST-13	Plainwell City	55-160-079-00	Paul Wolfson	Initial letter was picked up on September 10, 2007. ARCADIS BBL staff met with Dr. Wolfson at property in Plainwell on September 26 and walked riverbank. He indicated he would sign letter when more details are added. Revised letter sent on October 2. Called Dr. Wolfson on October 9 and spoke with his wife. Left a message on November 1. Talked with Dr. Wolfson on November 26 - he will not grant access.

Notes:

1. Cooper Township (Kalamazoo County) tax maps obtained from Prein & Newhof and parcel information obtained online at <http://coopertwp.org>.
2. Plainwell City (Allegan County) tax maps obtained online at <http://allegancounty.org/taxmaps/> and parcel information obtained online from <http://allegancounty.org>.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #9, November 2007

Table B — Upstream/Downstream Surface Water Sampling — Plainwell TCRA — Samples
Collected and Data Received in November 2007

Sample ID	Sample Date	Data Received	Sample Delivery Group	Sample Location
K30709	10/14/2007	11/2/2007	TCRA11_SDSP	10th Street Bridge
K30710	10/14/2007	11/2/2007	TCRA11_SDSP	Farmer Street Bridge
K30711	10/14/2007	11/2/2007	TCRA11_SDSP	Rinse Blank
K30712	10/16/2007	11/2/2007	TCRA11_SDSP	10th Street Bridge
K30713	10/16/2007	11/2/2007	TCRA11_SDSP	Farmer Street Bridge
K30714	10/18/2007	11/2/2007	TCRA12_SDSP	10th Street Bridge
K30715	10/18/2007	11/2/2007	TCRA12_SDSP	Farmer Street Bridge
K30716	10/20/2007	11/2/2007	TCRA12_SDSP	10th Street Bridge
K30717	10/20/2007	11/2/2007	TCRA12_SDSP	Farmer Street Bridge
K30718	10/22/2007	11/2/2007	TCRA12_SDSP	10th Street Bridge
K30719	10/22/2007	11/2/2007	TCRA12_SDSP	Farmer Street Bridge
K30720	10/24/2007	11/2/2007	TCRA12_SDSP	10th Street Bridge
K30721	10/24/2007	11/2/2007	TCRA12_SDSP	Farmer Street Bridge
K30722	10/26/2007	11/2/2007	TCRA12_SDSP	10th Street Bridge
K30723	10/26/2007	11/2/2007	TCRA12_SDSP	Farmer Street Bridge
K30724	10/28/2007	11/26/2007	TCRA13_SDSP	10th Street Bridge
K30725	10/28/2007	11/26/2007	TCRA13_SDSP	Farmer Street Bridge
K30726	10/30/2007	11/26/2007	TCRA13_SDSP	10th Street Bridge
K30727	10/30/2007	11/26/2007	TCRA13_SDSP	Farmer Street Bridge
K30728	11/1/2007	11/26/2007	TCRA13_SDSP	10th Street Bridge
K30729	11/1/2007	11/26/2007	TCRA13_SDSP	Farmer Street Bridge
K30730	11/3/2007	11/26/2007	TCRA14_SDSP	10th Street Bridge
K30731	11/3/2007	11/26/2007	TCRA14_SDSP	Farmer Street Bridge
K30732	11/5/2007	11/26/2007	TCRA14_SDSP	10th Street Bridge
K30733	11/5/2007	11/26/2007	TCRA14_SDSP	Farmer Street Bridge
K30734 ¹	11/7/2007	11/26/2007	TCRA14_SDSP	10th Street Bridge
K30735 [K30736]	11/7/2007	11/26/2007	TCRA14_SDSP	Farmer Street Bridge
K30737	11/9/2007	NR	NR	10th Street Bridge
K30738	11/9/2007	NR	NR	Farmer Street Bridge
K30739	11/11/2007	NR	NR	Farmer Street Bridge
K30740	11/11/2007	NR	NR	10th Street Bridge
K30741	11/13/2007	NR	NR	10th Street Bridge
K30742	11/13/2007	NR	NR	Farmer Street Bridge
K30743	11/15/2007	NR	NR	10th Street Bridge
K30744	11/15/2007	NR	NR	Farmer Street Bridge
K30745	11/17/2007	NR	NR	10th Street Bridge
K30746	11/17/2007	NR	NR	Farmer Street Bridge
K30747	11/19/2007	NR	NR	10th Street Bridge
K30748	11/19/2007	NR	NR	Farmer Street Bridge
K30749	11/21/2007	NR	NR	10th Street Bridge
K30750	11/21/2007	NR	NR	Farmer Street Bridge

See Notes on Page 2.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #9, November 2007

Table B — Upstream/Downstream Surface Water Sampling — Plainwell TCRA — Samples Collected and Data Received in November 2007

Sample ID	Sample Date	Data Received	Sample Delivery Group	Sample Location
K30751	11/23/2007	NR	NR	10th Street Bridge
K30752	11/23/2007	NR	NR	Farmer Street Bridge
K30753	11/25/2007	NR	NR	10th Street Bridge
K30754	11/25/2007	NR	NR	Farmer Street Bridge
K30755	11/27/2007	NR	NR	10th Street Bridge
K30756	11/27/2007	NR	NR	Farmer Street Bridge
K30757 ¹	11/29/2007	NR	NR	10th Street Bridge
K30758 [K30759]	11/29/2007	NR	NR	Farmer Street Bridge

Notes:

N/A - Not available.

NR - Data not received as of November 30, 2007.

All samples analyzed by TestAmerica Laboratories, Inc. for PCBs and TSS.

Duplicate samples are in brackets.

¹MS/MSD performed on this sample.

**Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #9, November 2007**

**Table C — Resident Fish Collected in Otsego City Impoundment — Samples Collected and Data
Received in November 2007**

Species	Sample Type	Sample ID	Date Collected	Number Individuals	Total Length1 (cm)	Weight1 (g)	Sample Delivery Group
Smallmouth Bass	Whole-body Composite	SMB-08	11/6/07	2	15.3, 15.7	41.6, 43.5	KAL437
Smallmouth Bass	Whole-body Composite	SMB-09	11/7/07	2	14.9, 15.1	37.0, 43.2	
Smallmouth Bass	Whole-body Composite	SMB-10	11/7/07	2	15.3, 16.4	45.7, 50.1	
Smallmouth Bass	Whole-body Composite	SMB-11	11/7/07	2	14.0, 14.9	35.5, 40.0	
Smallmouth Bass	Whole-body Composite	SMB-12	11/7/07	2	16.0, 16.7	51.8, 57.6	

Notes:

1. Lengths and weights are ordered and correspond to individual fish.

cm = centimeter.

g = grams.

All samples analyzed by TestAmerica Laboratories, Inc. for PCBs and lipids.

Availability of yearling smallmouth bass in Otsego City Impoundment was low. Collected fish were distributed equally into five composite samples of two fish each.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #9, November 2007

Table D — Surface Sediment Samples For Which Data Have
Been Received — Former Georgia-Pacific Mill Lagoons to Crown
Vantage Landfill — Data Received in November 2007

1993/1994 Transect	2000 Location ID	Collection Date	Sample ID	Top Depth (in)	Bottom Depth (in)	Sample Delivery Group
KPT19	KP2C-9	10/11/2007	K55404	0	2	SRI001
	KP2F-3	10/11/2007	K55403	0	2	
	KP2F-4	10/11/2007	K55402	0	2	
	KP2F-5	10/11/2007	K55400 [K55401] ¹	0	2	
	KP2C-10	10/11/2007	K55406	0	2	
	KP2F-6	10/11/2007	K55405	0	2	
KPT21	KP3C-6	10/18/2007	K55431 [K55433] ¹	0	2	SRI002
	KP3F-4	10/18/2007	K55432	0	2	
KPT22	KP3C-2	10/11/2007	K55408	0	2	SRI001
	KP3C-3	10/11/2007	K55407	0	2	
	KP3F-1	10/18/2007	K55430	0	2	SRI002
KPT23	KP3C-4	10/11/2007	K55411	0	2	SRI001
	KP3C-5	10/11/2007	K55410	0	2	
	KP3F-2	10/11/2007	K55409	0	2	
	KP3F-3	10/18/2007	K55429	0	2	SRI002
KPT24	KP3C-10	10/18/2007	K55428	0	2	SRI002
	KP3C-8	10/12/2007	K55413	0	2	SRI001
	KP3C-9	10/12/2007	K55412	0	2	
KPT25	KP3C-12	10/12/2007	K55415	0	2	SRI001
	KP3F-5	10/12/2007	K55418	0	2	
	KP3F-6	10/12/2007	K55417	0	2	
	KP3F-7	10/12/2007	K55416	0	2	
	KP3F-8	10/12/2007	K55414	0	2	
KPT26	KP3C-1	10/12/2007	K55419	0	2	SRI001
	KP3C-11	10/18/2007	K55427	0	2	SRI002
KPT27	KP4C-10	10/18/2007	K55425	0	2	SRI002
	KP4F-10	10/18/2007	K55426	0	2	
KPT28	KP4C-9	10/18/2007	K55423	0	2	SRI002
	KP4F-8	10/18/2007	K55422	0	2	
	KP4F-9	10/18/2007	K55424	0	2	
KPT29	KP4C-7	10/18/2007	K55420	0	2	SRI002
	KP4F-7	10/18/2007	K55421	0	2	

Notes:

All samples analyzed by TestAmerica Laboratories, Inc.

¹MS/MSD performed on this sample.

Duplicate samples are in brackets.

Samples analyzed for PCBs, TOC and particle size.

Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #9, November 2007

**Table E — Surface Sediment Samples For Which Data Have Been Received — Plainwell No. 2
Dam to the Mill Race Confluence — Data Received in November 2007**

1993/1994 Transect	2000 Location ID	Collection Date	Sample ID	Top Depth (in)	Bottom Depth (in)	Sample Delivery Group
KPT48	KP6C-7	10/23/2007	K55443	0	2	SRI003
	KP6C-8	10/23/2007	K55444	0	2	
KPT49	KP6F-7	10/24/2007	K55445	0	2	SRI003
KPT50	KP6C-14	10/24/2007	K55448	0	2	SRI004
	KP6F-10	10/24/2007	K55450	0	2	SRI003
	KP6F-8	10/24/2007	K55446 [K55447] ¹	0	2	
	KP6F-9	10/24/2007	K55449	0	2	SRI004
KPT51	KP7C-2	10/24/2007	K55451 [K55452] ¹	0	2	SRI004
	KP7C-3	10/24/2007	K55453	0	2	
	KP7C-4	10/24/2007	K55454	0	2	
KPT52	KP7C-7	10/24/2007	K55456	0	2	SRI004
	KP7F-3	10/24/2007	K55455	0	2	
	KP7F-4	10/24/2007	K55457	0	2	
KPT53	KP6C-10	10/23/2007	K55436	0	2	SRI003
	KP6C-11	10/23/2007	K55437	0	2	
	KP6C-12	10/23/2007	K55438	0	2	
	KP6C-13	10/23/2007	K55439	0	2	
KPT54	KP7C-1	10/23/2007	K55441	0	2	SRI003
	KP7F-1	10/23/2007	K55440	0	2	
	KP7F-2	10/23/2007	K55442	0	2	
KPT56	KP8C-1	10/22/2007	K55434	0	2	SRI003
	KP8F-1	10/22/2007	K55458	0	2	SRI004
	KP8F-2	10/22/2007	K55435	0	2	SRI003

Notes:

All samples analyzed by TestAmerica Laboratories, Inc.

¹MS/MSD performed on this sample.

Duplicate samples are in brackets.

Samples analyzed for PCBs, TOC and particle size.

**Kalamazoo River Study Group
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Monthly Report #9, November 2007**

**Table F — Top-of-Bank Soil Cores — Plainwell No. 2 Dam to Mill Race
Confluence — Samples Collected in November 2007**

Transect	Location	Date Collected	Soil Penetrated (feet)	Soil Recovered (feet)
KRT13	KRT13-TB-A	Property Access not Granted (see Table A)		
KRT14	KRT14-TB-A	11/27/2007	2.6	2.4